Monte J. White & Associates, PC Monte J. White 1106 Brook Ave., Hamilton Place Wichita Falls, TX 76301 (940)723-0099 (940)723-0096 fax

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS WICHITA FALLS DIVISION

IN RE:	§
	§
Joshua James Snyder	§
and	§ CASE NO. 08-70177-HDH-13
Courtney Denise Snyder	§
	§
DEBTORS	§

## MOTION FOR DEBTORS' AUTHORITY TO OBTAIN CREDIT TO REFINANCE A VEHICLE

## TO THE HONORABLE JUDGE OF SAID COURT:

DEBTORS, Joshua James Snyder and Courtney Denise Snyder file this Motion for Debtors' Authority to Obtain Credit to Refinance a Vehicle, and would respectfully show the Court as follows:

- 1. Debtors' Chapter 13 case was filed on May 9, 2008.
- 2. Debtors' case was confirmed on June 27, 2008.
- 3. Debtors wish to refinance their current vehicle, which is being leased. The lease is set to expire October 25, 2009. The loan amount will not exceed \$20,352.86. Nissan Motor Acceptance Corporation is attempting to assist the Debtors with financing and have provided this office with the attached "Good Faith Estimate". See Exhibit "A"
- 4. Debtors propose to repay the financed amount over 60 months at approximately 17.74% interest with a monthly payment of approximately \$517.70. Additionally, Debtors request that the Court grants them permission to pay such expenses of purchase as set forth in the said attached estimate.
- 5. Amended Schedule I and J of Debtors' Voluntary Petition on file with the Clerk of this Court reflects sufficient disposable income to make the required payments of approximately \$517.70 per month toward the refinance of the vehicle.
- 6. Debtors request permission to pay the amount of \$400.00 directly to Monte J. White and

Associates, P.C. for the preparation and filing of this motion.

FOR THESE REASONS, Debtors request an order allowing the refinance as set forth herein, and for such other and further relief to which Debtors may show themselves entitled.

Respectfully submitted,

/s/Monte J. White Attorney for Debtor(s)

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 1, 2009, a true and correct copy of the foregoing was served on all parties in interest listed on the following mailing list by ECF and/or regular mail.

/s/Monte J. White Attorney for Debtor(s) Label Matrix Case 08-70177-hdh13 0539-7 Case 08-70177-hdh13

Northern District of Texas Wichita Falls Tue Sep 29 11:30:10 CDT 2009

AAFES/MIL STAR/EXCHANGE

P O Box 740933 Dallas, TX 75374-0933

Calvary Portfolio Services P.O. Box 1017 Hawthorne, NY 10532-7504

First National Bank of Lubbock 1500 Broadway Lubbock, TX 79401-3117

HSBC Bank Nevada, N.A. Bass & Associates, P.C. 3936 E. Ft. Lowell Rd, Suite 200 Tucson, AZ 85712-1083

IRS Special Procedures 1100 Commerce St., Room 951 Mail Stop 5029 DAL Dallas, TX 75242-1001

Military Star P.O. Box 78731 Phoenix, AZ 85062-8731

Nissan - Infiniti LT Po Box 660366 Dallas TX 75266-0366

Recovery Management Systems Corporation 25 S.E. 2nd Avenue, Suite 1120 Miami, FL 33131-1605

T-Mobile P.O. Box 660252 Dallas, Texas 75266-0252

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Miami, FL 33131-1605

Amsher Collection Services 600 Beacon Pkwy W Suite 300 Birmingham, AL 35209-3114

Career Blazers Learning Center Attention: Maria Duran 290 Madison Ave 3rd Floor New York, NY 10017-6363

GEMB-Dillards P.O. Box 960012 Orlando, FL 32896-0012

HSBC-Best Buy Retail Services P.O. Box 5238 Carol Stream, IL 60197-5238

Lions Court 1200 Thompson Rd. Wichita Falls, Texas 76301-7404

Moore & McCollum, P.C. Attorneys At Law 961 Walnut Street Macon, Georgia 31201-1906

Nissan Motor Acceptance Corporation P.O. Box 650679 Dallas, Texas 75265-0679 Lease No. :25005774048

Robins Federal Credit 803 Watson Blvd Warner Robins, GA 31093-3400

(p) VOLKSWAGEN CREDIT UNION 1401 FRANKLIN BLVD LIBERTYVILLE IL 60048-4460

Bank of America P.O. Box 2284 Brea, CA 92822-2284

Dallas, TX 75242-1305

Cavalry Portfolio Services, LLC 7 Skyline Drive, Third Floor Hawthorne, NY 10532-2156

HBC Property Managers, LP 2651 Horseshoe Lake Road Iowa Park, Texas 76367-8152

HSBC-Best Buy Retail Services P.O. Box 60148

City of Industry, CA 91716-0148

MagnUS Services, Inc. P.O. Box 43730 Baltimore, MD 21236-0730

NCO Financial Systems GE Money-Dillards P.O. Box 960012 Orlando, FL 32896-0012

PRA Receivables Management, Llc As Agent Of Portfolio Recovery Assocs. c/o Southwestern Bell Telephone POB 41067 NORFOLK VA 23541-1067

T Mobile USA Inc Attn: Bankruptcy Dept. PO Box 53410 Bellevue, Wa 98015-3410

Wells Fargo Bank Overdraft Recovery Payment Pro. Dept. A0143-042 P.O. Box 63491 San Francisco, Ca 94163-0001

Case 08-70177-hdh13 Assignee of HSBC Bank Nevada Bass & Associates, P.C. 3936 E. Ft. Lowell Road, Suite #200 Tucson, AZ 85712-1083

1200 Thompson Rd. Apt. 1414

Walter 12,13 OCheskey 6308 Iola Avenue Lubbock, TX 79424-2735

Joshua James Snyder

Wichita Falls, TX 76301-7464

GE Money Bank D POB 35480 Newark NJ 07193-5480

Monte J. White Monte J. White & Associates, P.C. 1106 Brook Avenue Wichita Falls, TX 76301-5009

Entered 10/01/09 11:01:54 Desc Main age 4 of 4 1200 Thompson Rd. Apt. 1414 Wichita Falls, TX 76301-7464

> UST U.S. Trustee 1100 Commerce Street Room 976 Dallas, TX 75242-1011

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Volkswagon Credit Inc. 1401 Franklin Blvd Libertyville, IL 60048

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) HSBC Bank Nevada, N.A.

End of Label Matrix Mailable recipients 36 Bypassed recipients 1 37 Total